

# EXHIBIT

**W**

## Shelly Bloor

---

**From:** Will Cochran  
**Sent:** Wednesday, February 26, 2020 4:48 PM  
**To:** Chris Williams  
**Subject:** FW: Depos

**From:** MMcLaren <MMcLaren@blackmclaw.com>  
**Sent:** Tuesday, February 18, 2020 3:50 PM  
**To:** Horton, Odell <ohorton@wyattfirm.com>  
**Cc:** Craddock, Bob <rcraddock@wyattfirm.com>; Brice Timmons <btimmons@blackmclaw.com>; fwatson@watsonburns.com; Will Cochran <wcochran@blackmclaw.com>; wroutt@watsonburns.com; bburns@watsonburns.com; Lee Whitwell (lee.whitwell@shelbycountyn.gov) <lee.whitwell@shelbycountyn.gov>  
**Subject:** Re: Depos

Odell, your understanding is not correct. We have always maintained that we are mindful of the Court's Orders and will conduct these depositions accordingly. If you disagree with our questions you can object. Or, you can seek a protective order now. Are you going to produce these non 30 (b) (6) witnesses? A simple yes or no will suffice so we can approach the Court. Thanks, Mike

Michael G. McLaren  
Black McLaren Jones Ryland & Griffey  
530 Oak Court Dr., Ste. 360  
Memphis, TN 38117  
901-270-6525

Sent from my iPhone

On Feb 18, 2020, at 2:43 PM, Horton, Odell <ohorton@wyattfirm.com> wrote:

Mike,

Shelby County wants to understand Plaintiffs' positions before answering your question. It is our understanding Plaintiffs will withdraw their 30(b)(6) Deposition Notice to Shelby County. It is also our understanding Plaintiffs would issue new deposition notices to the Shelby County employees with the understanding their depositions are for class certification purposes only and Plaintiffs would limit their questions to class issues. Please let me know if my understanding is correct regarding these issues.

Thank you.

Odell

**Odell Horton Jr.**

Wyatt, Tarrant & Combs, LLP  
Direct: (901) 537-1082

**From:** MMcLaren@blackmclaw.com <MMcLaren@blackmclaw.com>  
**Sent:** Monday, February 17, 2020 3:55 PM  
**To:** Craddock, Bob <rcraddock@wyattfirm.com>; Horton, Odell <ohorton@wyattfirm.com>  
**Cc:** btimmons@blackmclaw.com; fwatson@watsonburns.com; wcochran@blackmclaw.com;  
wroutt@watsonburns.com; bburns@watsonburns.com  
**Subject:** Depos

Bob, Odell, you have several Depo notices – do you intend to produce anyone on the dates noticed. Just a simple yes or no please.

### **Disclaimer**

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

=====

The information contained in this transmission is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. If you are not the intended recipient of this information, do not review, retransmit, disclose, disseminate, use, or take any action in reliance upon this information. If you received this transmission in error, please contact the sender immediately, destroy all printed copies, and delete the material from all computers.

=====